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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TRENT DREXEL HOWARD,

15 Defendant.

4:19-CR-6036-SMJ

INDICTMENT

Vio: 18 U.S.C. § 2252A(a)(2)(A),
(b)(1)
Receipt of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A),
(b)(1)
Distribution of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
Possession of Child Pornography
(Count 3)

18 U.S.C. § 2251(a), (e)
Attempted Production of Child
Pornography
(Count 4)

18 U.S.C. § 2253
Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3 Beginning on or about November 20, 2018, and continuing until on or about
4 June 5, 2019, in the Eastern District of Washington and elsewhere, the Defendant,
5 TRENT DREXEL HOWARD, did knowingly receive child pornography, as defined
6 in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
7 commerce by any means, including by computer, to wit: images depicting minor and
8 prepubescent children engaging in sexually explicit conduct, including but not limited
9 to the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C. §
10 2252A(a)(2)(A), (b)(1).

11 COUNT 2

12 Beginning on or about November 20, 2018, and continuing until on or about
13 May 28, 2019, in the Eastern District of Washington and elsewhere, the Defendant,
14 TRENT DREXEL HOWARD, did knowingly distribute child pornography, as defined
15 in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in interstate
16 commerce by any means, including by computer, to wit: images depicting minor and
17 prepubescent children engaging in sexually explicit conduct, including but not limited
18 to the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C.
19 § 2252A(a)(2)(A), (b)(1).

20 COUNT 3

21 On or about June 5, 2019, in the Eastern District of Washington, the Defendant,
22 TRENT DREXEL HOWARD, did knowingly possess material which contained one
23 or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A),
24 including images of prepubescent minors and minors who had not attained twelve
25 years of age, the production of which involved the use of a minor engaging in sexually
26 explicit conduct, and which visual depictions were of such conduct; that had been
27 mailed, shipped and transported in interstate and foreign commerce, and which were
28

1 produced using materials that had been mailed, shipped and transported in interstate or
2 foreign commerce, by any means including computer, all in violation of 18 U.S.C.
3 § 2252(a)(5)(B), (b)(2).

4 COUNT 4

5 Beginning on an unknown date, but at least by on or about August 17, 2012,
6 and continuing until on or about June 5, 2019, in the Eastern District of Washington,
7 the Defendant, TRENT DREXEL HOWARD, did knowingly attempt to use a minor
8 child, to engage in sexually explicit conduct, for the purpose of producing any visual
9 depiction of such conduct, such visual depiction to be produced using materials that
10 have been mailed, shipped, and transported in and affecting interstate and foreign
11 commerce by any means, including by computer, in violation of 18 U.S.C. § 2251(a),
12 (e).

13 NOTICE OF FORFEITURE ALLEGATIONS

14 The allegations contained in this Indictment are hereby realleged and
15 incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C.
16 § 2253.

17 Pursuant to 18 U.S.C. § 2253, upon conviction of any of the child pornography
18 charges in Counts 1 – 4 of this Indictment, the Defendant, TRENT DREXEL
19 HOWARD, shall forfeit to the United States any visual depiction described in section
20 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film,
21 videotape, or other matter which contains any such visual depiction, which was
22 produced, transported, mailed, shipped or received in violation of this chapter;

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1 any property, real or personal, constituting or traceable to gross profits or other
2 proceeds obtained from such offenses; and, any property, real or personal, used or
3 intended to be used to commit or to promote the commission of such offenses, or any
4 property traceable to such property.

5 DATED this 13 day of June, 2019.

6
7 A TRUE BILL

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9
10 Fore

11 
12 Joseph H. Harrington
13 United States Attorney

14 
15 Ann T. Wick
16 Assistant United States Attorney